

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
Mr. Wilson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21cr155-JAM-1
Plaintiff,)	
vs.)	STIPULATION AND ORDER TO MODIFY
)	CONDITIONS OF RELEASE
JOSHUA DANIEL WILSON, ET.)	Judge: Hon. Carolyn K. Delaney
AL.)	
<u>Defendant.</u>)	

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Daniel Wilson that:

1. On September 16, 2021, The Court imposed an unsecured bond in the amount of \$50,000 for Mr. Wilson. ECF no. 29.
2. Special Condition #15 for Mr. Wilson reads: You must not gamble, either in person or online, or enter any gambling establishments. ECF no. 30.
3. Mr. Wilson respectfully requests that the Court modify Special Condition #15 as follows:
 - a. You must not gamble, either in person or online, or enter any gambling establishments. However, you may enter a gambling establishment solely for

1 employment purposes and remain there only for the duration of the work required
2 by that employment.

3 4. The assigned pretrial services Officer, Taifa Gaskins, and AUSA Conolly do not object to
4 Mr. Wilson's request.

5 Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Defender

8 Date: February 1, 2022

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Wilson

12 Date: February 1, 2022

11 PHILLIP A. TALBERT
13 United States Attorney


14 /s/ James R. Conolly
JAMES R. CONOLLY
15 Assistant United States Attorney
16 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: February 2, 2022



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE